



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY


WASHINGTON, D.C. 20460

AUG 12 1996

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations on the DuPont, Necco Park Site.

FROM: Bruce Means, Chair 
National Remedy Review Board

TO: Richard L. Caspe, Director
Emergency and Remedial Response Division
EPA Region 2

The purpose of this memorandum is to document the findings of the National Remedy Review Board (NRRB) on the proposed remedial action for the DuPont, Necco Park Site in New York State.

Background.

As you recall, the Administrator established the NRRB as one of the October 1995 Superfund Administrative Reforms to help control remedy costs and promote consistent and cost-effective decisions. The Board will review all proposed cleanup actions where: (1) the estimated cost of the preferred alternative exceeds \$30 million, or (2) the preferred alternative costs more than \$10 million and is 50% more expensive than the least-costly, protective, ARAR-compliant alternative. In its review, the NRRB considers the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; regional, State/tribal, and other stakeholder opinions on the proposed actions (to the extent they are known at the time of review); and any other relevant factors or program guidance.

Generally, the NRRB makes "advisory recommendations" to the appropriate Regional decision maker before the Region issues the proposed plan. These recommendations are then to be included in the Administrative Record for the site. While the Region is expected to give the Board's recommendations substantial weight,

-- Pre-Decisional; Not for Distribution --

other important factors, such as subsequent public comment or technical analyses of remedial options, may influence the final Regional decision. It is important to remember that the NRRB does not change the Agency's delegation authorities or alter in any way the public's current role in site decisions. This Reform is intended to focus the program's extensive experience on decisions at a select number of high stakes sites.

NRRB Findings.

The NRRB reviewed the proposed plan for the Necco Park site along with other relevant site information with Regional staff, including Dale Carpenter, Kevin Lynch, and George Shanahan, on May 7, 1996. Based on the information provided, the NRRB generally supports the Agency's proposal for source control presented in Alternative 9.

Key objectives of Alternative 9 are to minimize constituent loading to the far-field aquifer, create a physical barrier to subsurface DNAPL migration, minimize precipitation percolation through contaminated soil in the DNAPL source area, prevent direct human contact with contaminated soil, and reduce the overall volume of subsurface DNAPL. Based on these objectives, the NRRB recommends:

- At this time, the scope of the ROD should be limited to source control only, and should not make a final decision on off-site ground water in the far field aquifer. The Board recommends that this proposed alternative include evaluating the impact of the source control remedy on far-field groundwater contamination.
- Additional site characterization (sampling and analysis) should be conducted to assess whether natural attenuation may be effective in addressing far-field contamination.
- The proposed alternative includes upgrading the existing cap over portions of the Necco Park site to reduce percolation within the source area, while at the same time leaving other areas within the source area uncovered. The Region should consider extending the cap (or the use of other cover materials) to address infiltration in areas within the proposed grout curtain but not currently addressed by this upgrade.
- Given the status (i.e., near completion) of cleanups for other sites in the area and that several unsuccessful attempts were made to design an area-wide multi-source cleanup strategy, the Board supports the current source-by-source approach for addressing regional contamination. However, the RRB notes that conditions in this area suggest a more global, or multi-source cleanup/waste management strategy may have been appropriate, and recommends that the Region evaluate this type of approach for any future proposed remediation of the

-- Pre-Decisional; Not for Distribution --

far-field aquifer contamination. For example, the Region may want to assess, as a future alternative, a strategy of adapting existing man-made structures, such as the Falls Street tunnel and the NYPA conduit drain jacket system; as an integral part of a collection system for multi-source treatment of far field contamination.

The NRRB appreciates the Region's efforts to develop the proposed remedy. The Board especially wants to thank the Region for their participation in the review process. The NRRB encourages Region 2 management and staff to work with their Regional NRRB representative and the OERR Region 2/6 Regional Accelerated Response Center at Headquarters to discuss appropriate follow-up actions.

Please do not hesitate to give me a call at 703-603-8815 should you have any questions.

cc: S. Luftig
E. Laws
T. Fields
B. Breen
J. Fox
E. Shaw

-- Pre-Decisional; Not for Distribution --